

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	
)	Chapter 11
ALL YEAR HOLDINGS LIMITED,)	
)	Case No. 21-12051 (MG)
Debtor.)	
)	
Fed Tax Id. No. 98-1220822)	
_____)	
ZELIG WEISS,)	
)	
Plaintiff,)	Adv. Proc. No. 22-1115 (MG)
)	
v.)	
)	
)	
ALL YEAR HOLDINGS LIMITED, WYTHE)	
BERRY MEMBER LLC, and YG WV LLC,)	
)	
Defendants.)	
_____)	

STIPULATION AND [PROPOSED] ORDER

This Stipulation is entered into by and between the undersigned counsel for Plaintiff Zelig Weiss (“Plaintiff”) and counsel for Defendants All Year Holdings Limited, Wythe Berry Member LLC, and YG WV LLC (collectively, “Defendants”).

WHEREAS, Plaintiff filed his Adversary Complaint (ECF No. 1) against Defendants on July 5, 2022;

WHEREAS, the Clerk’s Office issued a Summons with Notice of Pre-Trial Conference (ECF No. 2) on July 6, 2022;

WHEREAS, Plaintiff served the Summons and Complaint on, inter alia, Defendants on July 6 and 8, 2022;

WHEREAS, the Clerk's Office issued a Second Summons with Notice of Pre-Trial Conference (ECF No. 4) on July 14, 2022;

WHEREAS, Plaintiff served the Second Summons and Complaint on Defendant YG WV LLC on July 18, 2022;

WHEREAS, Plaintiff currently anticipates filing an amended complaint with limited revisions;

WHEREAS, the parties are currently negotiating a briefing schedule for anticipated motion practice;

WHEREAS, the parties wish to set Defendants' date to respond to the Complaint, subject to further adjustment upon Plaintiff's filing of an Amended Complaint and/or final agreement on a briefing schedule for anticipated motion practice;

IT IS NOW STIPULATED AND AGREED, subject to further adjustment upon Plaintiff's filing of an Amended Complaint and/or final agreement on a briefing schedule for anticipated motion practice, that Defendants' deadline to respond to the Complaint is August 15, 2022;

IT IS FURTHER STIPULATED AND AGREED, by and between the undersigned counsel for the parties, that this stipulation shall not be deemed to waive or prejudice any party's claims or defenses, and shall not prejudice the rights of any party to seek or oppose any other relief.

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Attorneys for Defendants

SO ORDERED.

Martin Glenn
Chief United States Bankruptcy Judge

Dated: _____, 2022